

CGB-CC-0965

Received & Inspected

JAN 26 2012

FCC Mail Room

Office of the Secretary
Federal Communications Commission
Disability Rights Office
Room 3-B431
9300 East Hampton Drive
Capitol Heights, MD 20743

January 13, 2012

Re: Petition for Undue Burden Exemption from Closed Captioning Rules

To Whom It May Concern:

This letter requests an exemption on behalf of Turning Point Church in Indianapolis from the FCC's closed captioning rules based on undue burden. The original and two copies of this letter and all support are being provided.

Turning Point Christian Church is a donor supported non-profit organization under the laws of the state of Indiana. We produced a weekly 60-minute television program. The program teaches and inspires viewers how to develop their relationship with God and is produced locally by the Turning Point Christian Church staff. It is broadcast to the public on WHMB-TV throughout Central Indiana. Turning Point Christian Church pays WHMB-TV \$885.00 per week to air the show over its broadcast facilities.

Captioning the program would present an undue burden for several reasons:

1. We do not have the financial resources to caption the program ourselves. Our research has determined it would cost \$5,000-8,000 to purchase the necessary equipment and the church is unable to take on that cost at this time.

2. Being a small church, production of the program is done by a few volunteers and the additional expertise and manpower to caption each program is not available.
3. We've also explored closed captioning services. This would cost an additional \$250 per week or \$13,000 per year. The added cost for captioning would make production of the program unaffordable and the time for captioning would make meeting WHMB-TV's air date deadlines impossible.
4. WHMB-TV does not provide closed captioning and has said it is unlikely to do so in the foreseeable future because of the additional time and staff that would be required.
5. As a church, we have attempted to solicit sponsorships to pay for the cost of closed captioning, but have been unsuccessful.

Providing closed captioning would ultimately cause us to either terminate or severely limit production of the program and cause us to lose supporters who would no longer be able to regularly view the program.

While Turning Point Christian Church recognizes the importance closed captioning can have, based on the above facts set forth in this letter, we respectfully request that Turning Point Christian Church be granted an undue burden exemption from the captioning requirements.

Respectfully:

Turning Point Christian Church

By: _____

Printed Name: _____

Title: _____